

EXHIBIT J

to the Declaration of
Lisa Cisneros Shaver in Support of
Plaintiffs' Supplemental Motion
for Class Certification

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3 SAN JOSE DIVISION
4

5 IN RE: HIGH-TECH EMPLOYEE)
6 ANTITRUST LITIGATION)
7) No. 11-CV-2509-LHK
8 THIS DOCUMENT RELATES TO:)
9 ALL ACTIONS.)
10 _____)
11

12 VIDEOTAPED DEPOSITION OF MASON STUBBLEFIELD
13 ATTORNEYS' EYES ONLY
14 Friday, March 29, 2013
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24 Reported By:
25 KATHLEEN WILKINS, CSR #10068, RPR-RMR-CRR-CCRR-CLR

10:41:17 1 actual steps were along the way of the whole
10:41:21 2 audit.

10:41:23 3 A. We -- we have a system that we use to
10:41:25 4 capture the recommendations. We would -- there
10:41:28 5 was some -- some reporting, some budget
10:41:30 6 information that would be available directly out
10:41:32 7 of that system.

10:41:33 8 And in some cases it would be
10:41:35 9 reporting -- pulling that data out into an Excel
10:41:38 10 file and then doing a number of different -- forms
10:41:41 11 of analysis on the data. So looking at
10:41:44 12 differentiation. So looking at merit increases,
10:41:47 13 increase recommendations by performance ratings,
10:41:50 14 looking at bonus recommendation by performance
10:41:52 15 ratings, looking to see ratios between those to
10:41:55 16 make sure that we're delivering for performance.

10:41:57 17 Looking at data across the different
10:41:59 18 leaders below the senior leader to make sure we
10:42:02 19 had consistency and compliance to budget at an
10:42:04 20 overall level. And, again, looking for
10:42:07 21 consistency between performance ratings and pay
10:42:10 22 decisions.

10:42:11 23 Q. And you said there was a system that
10:42:12 24 captures this. Is there an internal site in your
10:42:19 25 database at Intuit where managers would log on and

10:42:22 1 input what their recommended ratings were and
10:42:27 2 merit increases would be for employees?

10:42:32 3 A. Yes. We've used a couple different
10:42:34 4 systems. They're web-based online systems that a
10:42:37 5 manager would log into that would give them access
10:42:39 6 to their group of employees and ability to make
10:42:42 7 recommendations, capture those decisions.

10:42:44 8 Q. And then how did you do the audit? Did
10:42:46 9 you review all of those different recommendations?

10:42:49 10 A. Pri- -- in general, no. Not reviewed
10:42:53 11 each individual recommendation. Organizations are
10:42:55 12 very large. So we'd do audits looking for
10:42:58 13 patterns.

10:42:58 14 Q. Okay. Were there certain things that
10:43:01 15 would show up or would catch your eye as eye
10:43:05 16 opening in a recommendation?

10:43:06 17 A. Sure.

10:43:08 18 Q. What would that be?

10:43:10 19 A. A pay increase that was outside a
10:43:12 20 guideline for the performance rating, perform a --
10:43:15 21 any -- any inconsistencies. We have a set of
10:43:19 22 guidelines and we would have exception reporting
10:43:21 23 to identify things that were outside of those
10:43:24 24 guidelines and would audit those.

10:43:26 25 Q. So if -- so were there ranges of merit

10:43:32 1 increase that would be appropriate for different
10:43:34 2 performance ratings?

10:43:34 3 MR. KIERNAN: Object to form. Sorry.
10:43:38 4 Object to form.

10:43:40 5 THE WITNESS: We provide guidelines.
10:43:40 6 Intuit provides guidelines for what we would
10:43:44 7 expect a range of increase to be for a level of
10:43:46 8 performance.

10:43:47 9 BY MS. DERMODY:

10:43:47 10 Q. And then if a person -- if a manager had
10:43:50 11 recommended someone outside that guideline, would
10:43:53 12 that be something that you would audit?

10:43:55 13 A. Would depend on how far outside the
10:43:57 14 guideline it was. But likely it would be
10:43:59 15 something we'd look at to try to understand why
10:44:01 16 the recommendation was being made.

10:44:03 17 Q. Okay. And you mentioned that you were
10:44:06 18 involved in the audit process.

10:44:08 19 Was someone else also involved with you
10:44:11 20 reviewing the managers in your area?

10:44:14 21 A. I had a staff of HR business partners
10:44:16 22 that worked with specific leaders inside the
10:44:19 23 organization, and so they would do similar audits.
10:44:22 24 The compensation team that I had been part of
10:44:25 25 before would also do similar audits, try to help

10:44:28 1 us in going through the process.

10:44:29 2 Q. And was it your understanding that this
10:44:31 3 audit process was happening across the company
10:44:33 4 when managers were doing recommended merit raises
10:44:37 5 and bonuses?

10:44:39 6 A. There's a level of audit that happens
10:44:41 7 across the organization. I don't know that
10:44:43 8 it's -- that everyone else did exactly the same
10:44:46 9 things that I did, but there was a review process,
10:44:48 10 an audit process.

10:44:49 11 Q. Are you aware of specific differences in
10:44:52 12 the audit process across the organization?

10:44:55 13 A. I can't say that I'm aware of any
10:44:56 14 specific differences.

10:44:57 15 Q. Okay. And is this system that you
10:44:59 16 describe that captures the manager
10:45:02 17 recommendations, is that a system that is used
10:45:04 18 across the company?

10:45:07 19 A. Yes.

10:45:07 20 Q. Okay. And were there times where you
10:45:19 21 disagreed with a recommendation that a manager
10:45:22 22 made?

10:45:22 23 A. Yes. I'm sure -- I'm sure there were.

10:45:23 24 Q. And if that happened, would you decline
10:45:26 25 to approve that recommendation?

11:35:03 1 Q. Sure.

11:35:04 2 Are there other monetary awards for
11:35:06 3 employees in the company? And I'll stick with the
11:35:08 4 2005 to 2009 time period.

11:35:11 5 A. So we have a recognition program that
11:35:14 6 provides monetary value for specific events,
11:35:17 7 specific results, behaviors, things from
11:35:20 8 employees. We talked a bit about retention
11:35:25 9 bonuses, which would also be a monetary reward
11:35:27 10 that could -- is used in some situations, would be
11:35:30 11 available for employees.

11:35:35 12 Q. In terms of the recognition program,
11:35:38 13 again, sticking with the earlier time period than
11:35:41 14 now, what program or programs existed that had
11:35:45 15 compensation as a -- as a form of the reward?

11:35:51 16 A. With the recognition program
11:35:52 17 specifically?

11:35:52 18 Q. Yes.

11:35:55 19 A. The recognition program provides most
11:35:59 20 anyone in the organization an opportunity to
11:36:01 21 provide some value as recognition for a
11:36:04 22 contribution from someone else in the
11:36:06 23 organization. In most cases, that's not cash.
11:36:10 24 It's actually done in the form of gift
11:36:13 25 certificates. More like gift certificates or gift

11:36:16 1 cards where it's value and the person -- the
11:36:18 2 recipient turns that value into something that
11:36:21 3 they could keep as a more memorable item for the
11:36:25 4 recognition versus it just being cash. It's got
11:36:27 5 monetary value.

11:36:29 6 Q. Is that the spotlight program?

11:36:31 7 A. Yes, that's the spotlight program.

11:36:38 8 Q. And is there a range of value with these
11:36:41 9 gift certificates?

11:36:41 10 A. Yes.

11:36:43 11 Q. What would be the range?

11:36:46 12 A. \$50 to \$500 to a monetary value of a
11:36:55 13 trip that could be a couple thousand dollars.

11:37:03 14 Q. And for how long has the spotlight
11:37:05 15 program been around?

11:37:09 16 A. I don't know exactly when it started,
11:37:10 17 but it's been a key part of Intuit's compensation
11:37:13 18 approach for a number of years. Ten years or
11:37:15 19 more.

11:37:16 20 Q. Okay. So prior to your time maybe?

11:37:18 21 A. Yes. There was a recognition program
11:37:20 22 prior to my joining.

11:37:23 23 Q. And do you know if retention bonuses
11:37:26 24 have ever been allocated to employees proactively
11:37:33 25 before there's even a counteroffer or another

11:37:36 1 offer out there for that employee?

11:37:38 2 A. Yes.

11:37:39 3 Q. And describe those situations.

11:37:43 4 A. There's been situations in -- a few
11:37:47 5 different situations I can think of if there were
11:37:49 6 changes happening in a business, and we were
11:37:52 7 concerned that those changes in the business might
11:37:54 8 prompt attrition or contribute to attrition, we've
11:37:57 9 used proactive retention bonuses to try to lock
11:38:00 10 those employees for a given period of time.

11:38:04 11 If there were concerns about specific
11:38:05 12 skills or talent that were critical for us for a
11:38:09 13 project, we've used retention bonuses to try to
11:38:12 14 incent those employees to stay through the
11:38:16 15 completion of that project with the hope that
11:38:16 16 they'd stay much longer than that.

11:38:19 17 If we saw attrition in some area, we'd
11:38:23 18 use -- we use retention bonuses proactively to try
11:38:27 19 to secure, lock in, create the incentive for other
11:38:31 20 talent to stay.

11:38:35 21 Q. And has that been the practice going
11:38:37 22 back to when you started in 2004?

11:38:41 23 MR. KIERNAN: Object to form.

11:38:46 24 THE WITNESS: Intuit's pretty
11:38:48 25 consistently provided a variety of tools for

11:38:49 1 managers to use at their discretion as they need
11:38:52 2 them to. So we've had retention bonuses where a
11:38:56 3 tool that goes back to -- the start of my time as
11:38:58 4 one of the tools that was out there. We primarily
11:39:01 5 use equity as our retention vehicle, and it's been
11:39:05 6 out there as well.

11:39:06 7 BY MS. DERMODY:

11:39:07 8 Q. And is equity something that you have
11:39:10 9 used proactively to keep talent notwithstanding
11:39:15 10 any other offer that they might have in the
11:39:17 11 market?

11:39:21 12 MR. KIERNAN: Object to form.

11:39:23 13 THE WITNESS: Intuit includes equity as
11:39:25 14 part of the annual talent and pay process, and
11:39:28 15 based on the performance ratings, retention
11:39:31 16 ratings, employees are given a value of equity.

11:39:34 17 And so I would say in a lot of respects
11:39:36 18 that is a proactive retention tool. So it's not
11:39:39 19 in response to anything other than the performance
11:39:41 20 and what we see as their value going forward.

11:39:57 21 BY MS. DERMODY:

11:39:57 22 Q. And I think you testified earlier that
11:39:58 23 the compensation, including decisions about
11:40:01 24 equity, are generally made once a year; is that
11:40:04 25 right?

11:40:06 1 A. Yes.

11:40:09 2 Q. Have you been aware of any decisions to
11:40:11 3 do midyear equity grants or midyear bonuses for a
11:40:16 4 group of people?

11:40:18 5 A. I'm aware of a situation where Intuit
11:40:20 6 changed its process on equity and did equity
11:40:23 7 grants at midyear. I'm not aware of any
11:40:26 8 situations where midyear bonuses were granted to
11:40:29 9 anyone.

11:40:29 10 Q. Okay. What was the midyear equity
11:40:33 11 grant?

11:40:34 12 A. I think it was in 2008. I'm not sure on
11:40:40 13 the year. I think it was in 2008, a decision was
11:40:43 14 made to shift the equity grants from the normal
11:40:46 15 time period of July or August to February.

11:40:51 16 Q. So that wasn't an additional grant in
11:40:53 17 that cycle; it was just changing the time period
11:40:55 18 of that grant?

11:40:58 19 A. That's correct. It just shifted the
11:40:59 20 time frame.

11:40:59 21 Q. And are you aware of any groups of
11:41:01 22 employees being identified to receive additional
11:41:05 23 equity grants outside the normal cycle?

11:41:07 24 A. Yes. I'm aware of some situations where
11:41:09 25 that's been done.

11:41:11 1 Q. Okay. And describe those.

11:41:12 2 A. They'd be situations, oh, kind of like I
11:41:14 3 described before from a retention perspective. If
11:41:16 4 we saw attrition with a group of employees or a
11:41:19 5 certain skill set and we were concerned about
11:41:21 6 that, we'd use proactive equity grants with others
11:41:24 7 that we're seeing this top talent to try to incent
11:41:28 8 them to stay or use as another retention tool.

11:41:32 9 Q. Is that something that you've seen
11:41:34 10 happen going back to the 2005 time period?

11:41:40 11 A. I don't recall it happening -- it's not
11:41:42 12 something that happens very often inside the
11:41:43 13 organization. I can think of one situation where
11:41:45 14 it happened -- where it's happened, and that was
11:41:48 15 more recent.

11:41:49 16 Q. Okay. What was that situation?

11:41:50 17 A. It was with our marketing organization
11:41:52 18 where we were seeing slightly higher attrition in
11:41:55 19 marketing and were concerned about it, and so we
11:41:57 20 had the managers identify specific employees that
11:42:00 21 they saw as being key for them, and manager
11:42:04 22 discretion to nominate or recognize them, and a
11:42:06 23 small group were given some additional grants.

11:42:19 24 Q. And do you know, were these employees
11:42:20 25 that had threatened to leave?

11:42:25 1 A. I don't know. It was a proactive move
11:42:28 2 taken by the marketing leader, and the -- and the
11:42:31 3 staff across the marketing organization, in
11:42:33 4 looking at key skills, and trying to send them a
11:42:37 5 strong message about how we valued them.

11:42:45 6 Q. And you said that happened more
11:42:46 7 recently, this past year, two years ago?

11:42:50 8 A. Within the last year.

11:42:51 9 Q. Okay. And do you recall other
11:42:52 10 situations happening before that?

11:42:56 11 A. I don't recall other situations like
11:42:59 12 that.

11:43:01 13 Q. Is it possible that they happened but
11:43:04 14 you don't know? Is that --

11:43:05 15 A. Sure, it's possible.

11:43:30 16 Q. Are there any other strategies that
11:43:32 17 you're aware Intuit has used to proactively retain
11:43:37 18 key talent?

11:43:40 19 A. Yes.

11:43:41 20 Q. And can you describe those that are
11:43:44 21 compensation-based?

11:43:46 22 A. Most of the others would not be
11:43:48 23 compensation-based.

11:43:49 24 Q. Okay. Are those more work
11:43:54 25 assignment-based?

11:43:56 1 A. It could be work assignment-based,
11:43:59 2 development-oriented, project work, learning and
11:44:03 3 development opportunities.

11:44:18 4 Q. Are there any other compensation-based
11:44:21 5 strategies to retain key talent that you're aware
11:44:24 6 Intuit has used that you haven't already
11:44:26 7 described?

11:44:28 8 A. No, I don't think so.

11:44:28 9 Q. Okay. Were you aware that at some point
11:44:40 10 in time, Intuit had a policy not to recruit into
11:44:44 11 certain companies?

11:44:46 12 A. I'm not aware of any policy like that.

11:44:48 13 Q. Okay. Did you become aware of that at
11:44:50 14 some point in time?

11:44:51 15 A. I'm not aware that Intuit ever had a
11:44:54 16 policy like that.

11:44:56 17 Q. Were you aware that there was a practice
11:44:58 18 at Intuit not to recruit into some companies?

11:45:01 19 A. No. No, I was not.

11:45:02 20 Q. Okay. It's not something you ever heard
11:45:04 21 anyone talk about?

11:45:05 22 A. No.

11:45:10 23 Q. Were you aware that Intuit was
11:45:13 24 investigated by the Department of Justice in
11:45:15 25 connection with recruiting into other companies?

11:45:17 1 A. Yes, I am aware of that.

11:45:19 2 Q. And when did you become aware of that?

11:45:22 3 A. Probably soon after it -- or at the time
11:45:25 4 it became public.

11:45:26 5 Q. Okay. And I'm aware that there's more
11:45:28 6 than one set of investigations, so the only one
11:45:31 7 I'm concerned about is the one involving this
11:45:34 8 case, if that's clear to you.

11:45:37 9 A. Okay.

11:45:38 10 Q. Did you participate in the Department of
11:45:39 11 Justice investigation on behalf of Intuit?

11:45:42 12 A. No, I did not.

11:45:43 13 Q. You weren't interviewed by DOJ?

11:45:45 14 A. No, I was not.

11:46:17 15 Q. That one has already been marked, so I
11:46:19 16 can pass it right to you. That should have the
11:46:22 17 deposition Exhibit 918.

11:46:25 18 Do you see that?

11:46:26 19 A. Yes.

11:46:28 20 Q. Have you seen this document before?

11:46:34 21 A. I have seen it before.

11:46:35 22 Q. Prior to preparing for your deposition,
11:46:37 23 had you seen this before?

11:46:38 24 A. No, I had not.

11:46:39 25 Q. Have you ever talked to Mr. McNeal about

11:46:42 1 a do not contact list at Intuit?

11:46:47 2 A. No.

11:46:49 3 Q. Or how about Mr. Nguyen?

11:46:51 4 A. No.

11:46:52 5 Q. Or Miss Ross?

11:46:52 6 A. No.

11:47:00 7 Q. Do you have any type of relationship
11:47:01 8 with Mr. Bill Campbell?

11:47:05 9 A. Yes.

11:47:06 10 Q. Okay. And do you have a regular
11:47:12 11 occasion to meet with him?

11:47:13 12 A. Yes.

11:47:14 13 Q. And what is that?

11:47:16 14 A. There's a couple of situations. So
11:47:19 15 Mr. Campbell is chairman of the board, so on a
11:47:23 16 quarterly basis, I, along with a couple of others,
11:47:26 17 meet with him to talk about board agendas, and
11:47:29 18 specifically the committee agendas. I have
11:47:31 19 responsibility in working with him on the agenda
11:47:33 20 for the compensation organization development
11:47:35 21 committee.

11:47:35 22 And so prior to those meetings, we
11:47:37 23 review that agenda, and then he participates in
11:47:40 24 that committee meeting. And so I -- I attend
11:47:44 25 those meetings, and so whenever that group meets

11:49:06 1 at any other companies in the valley about
11:49:09 2 recruiting issues?

11:49:11 3 A. What do you mean by "recruiting issues"?

11:49:14 4 Q. About whether there should be certain
11:49:16 5 people off limits to recruiting across companies?

11:49:19 6 A. No.

11:49:47 7 Q. Let me ask you about Mr. Steve Jobs.

11:49:50 8 Did you have any relationship with him
11:49:51 9 when he was at -- still at Apple?

11:49:58 10 A. No, none at all.

11:49:59 11 Q. Okay.

11:49:59 12 (Whereupon, Deposition Exhibit 2738
11:49:59 13 was marked for identification.)

11:50:10 14 BY MS. DERMODY:

11:50:10 15 Q. The document placed in front of you as
11:50:12 16 Exhibit 2738 should bear an Intuit number on the
11:50:15 17 front cover, -43557.

11:50:19 18 Do you see that?

11:50:19 19 A. Yes.

11:50:19 20 Q. And in the document, I don't think there
11:50:21 21 are page numbers themselves, so bear with me as we
11:50:24 22 go through this.

11:50:27 23 If you look at the document, is this a
11:50:30 24 document or a spreadsheet that you recognize as
11:50:33 25 being used in the compensation area at Intuit?

11:50:43 1 A. So -- yes.

11:50:44 2 Q. And can you explain what this is?

11:50:50 3 A. I can try.

11:50:52 4 So the first page that has the
11:50:55 5 performance rating and the award as -- the award
11:50:58 6 range is a description of the guideline -- or is
11:51:03 7 the guidelines that are there for IPA bonus awards
11:51:07 8 based on the performance ratings for an
11:51:08 9 individual, kind of the range of an expected bonus
11:51:11 10 payment.

11:51:17 11 The second page is a mix of things. So
11:51:22 12 it looks like it's actually a collection of
11:51:24 13 multiple different documents that someone's put
11:51:26 14 together into a single page, because it would have
11:51:28 15 never been produced this way by itself. The piece
11:51:31 16 at the top looks like a template that -- just some
11:51:34 17 dates that were used for stock grant eligibility
11:51:37 18 back in 2005. And I'm not sure what the grant
11:51:41 19 date is because those don't look really
11:51:44 20 consistent.

11:51:46 21 Below that it's starting to describe the
11:51:47 22 way that guidelines were established and the tool
11:51:50 23 that managers used. And the very bottom piece is
11:51:54 24 actually a screen shot of what -- of what -- of
11:51:58 25 the system that we used to use and the control

11:52:00 1 table inside that system and how values were set.

11:52:02 2 So it's a screen shot of PeopleSoft.

11:52:05 3 Q. Okay.

11:52:05 4 A. So this document on its own could never
11:52:08 5 have been produced by itself just based on it
11:52:10 6 being a collection of different things.

11:52:11 7 Q. Okay. On that nine blocker control
11:52:17 8 section --

11:52:17 9 A. Yes.

11:52:17 10 Q. -- can you just walk me through what the
11:52:19 11 different columns are?

11:52:28 12 A. I'll try.

11:52:29 13 So the first piece is just a value
11:52:31 14 that's kind of used behind the scenes to connect
11:52:35 15 based on a certain set of employee circumstances
11:52:37 16 what parameters or what values would show up in a
11:52:40 17 calculation that's done within the system. So
11:52:42 18 it's just a value that's attached.

11:52:46 19 So the group values -- based on a group
11:52:49 20 value, it attaches to different things here. The
11:52:51 21 group value essentially attaches to a combination
11:52:53 22 of a performance rating and a retention rating for
11:52:56 23 an employee.

11:52:59 24 The eligibility, I don't recall exactly
11:53:01 25 what O meant in the system. T is -- was targeted.

11:53:05 1 It just kind of drove, again, what was there from
11:53:08 2 an equity perspective if someone would be
11:53:10 3 participating in the program or not.

11:53:12 4 The multiplier was a multiplier off of a
11:53:15 5 base and how we scale grants to increase the
11:53:19 6 grants for higher performance and higher retention
11:53:21 7 employees.

11:53:22 8 Then the next two columns were
11:53:24 9 guidelines around shares and just kind of a base
11:53:27 10 set of guidelines of what we would expect someone
11:53:31 11 to get in those -- those criteria.

11:53:36 12 Q. Okay. I'm not sure if the page that
11:53:42 13 follows is an excerpt from the very last page or
11:53:48 14 these are different things.

11:53:51 15 A. It's similar to what's on the very last
11:53:53 16 page, and so it may have been -- it may have been
11:53:56 17 part of a working product to get to what would end
11:53:59 18 up on that last page. So it's from an Excel file
11:54:02 19 and it was essentially a way to build or manage
11:54:05 20 the targets that got put back into the control
11:54:07 21 table, the nine block control table.

11:54:10 22 This would be the basis for having --
11:54:12 23 having an input document to put those -- those
11:54:16 24 values into the system. And then the last page,
11:54:19 25 the last page is a set of guidelines for what we

11:54:22 1 would expect as focal equity targets for different
11:54:27 2 levels of employees, different compensation
11:54:29 3 levels, and then the groups here tie back to those
11:54:32 4 groups from the control table. This is a document
11:54:38 5 that was used to build the system or to structure
11:54:40 6 values in the system.

11:54:41 7 Q. Okay. So if you were to take -- under
11:54:53 8 the position where it says VP, we'll do the top
11:54:56 9 line.

11:54:58 10 A. Okay.

11:54:58 11 Q. 300,000 plus, what is the 20,000 there?
11:55:01 12 Is that a guideline for the equity grant?

11:55:04 13 A. A target number of stock options that
11:55:06 14 would be granted.

11:55:07 15 Q. Okay. And going over to that middle
11:55:10 16 column where it's I guess California/Massachusetts
11:55:14 17 locations; is that fair?

11:55:16 18 A. Yes.

11:55:16 19 Q. Are the groups corresponding to ratings
11:55:20 20 people are receiving or something different?

11:55:22 21 A. The groups correspond to the combination
11:55:24 22 of a performance rating and a retention rating.

11:55:34 23 Q. So if I'm trying to read that -- that VP
11:55:37 24 level at 300,000, is the guideline that if they
11:55:42 25 are rated a two level, the stock grant would be

11:55:48 1 33,000 as opposed to 20,000?

11:55:50 2 A. Yes.

11:55:51 3 Q. Okay.

11:55:52 4 A. That's correct.

11:56:38 5 Q. Mr. Stubblefield, the document placed in
11:56:39 6 front of you should have a number in the front,
11:56:41 7 Exhibit 1761.

11:56:44 8 Do you see that?

11:56:44 9 A. Yes.

11:56:47 10 Q. If you'll open to the next page of it,
11:56:53 11 it starts what appears to be a PowerPoint, or
11:56:55 12 something like that, a presentation of some sort.

11:56:58 13 Do you recognize what this is?

11:57:01 14 A. So in looking at the presentation, I'm
11:57:04 15 familiar with it. I don't remember the -- I don't
11:57:06 16 know the exact context of how this was used.

11:57:09 17 Q. If you look on the second page, there
11:57:12 18 are page numbers in the lower left corner.

11:57:16 19 A. Yes.

11:57:16 20 Q. Might be helpful.

11:57:18 21 You'll see that there is a date in the
11:57:19 22 middle where it says January 7, 2005.

11:57:22 23 Do you see that?

11:57:23 24 A. Yes.

11:57:24 25 Q. And do you know in this time period who

14 The dismantling, unsealing, or unbinding
15 of the original transcript will render the
16 reporter's Certificates null and void.

19	x	Reading and Signing was requested.
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20 Reading and Signing was waived.

21	Reading and signing was not requested.
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22

23 KATHLEEN A. WILKINS

24	CSR 10068, RPR-RMR-CRR-CCRR-CLR
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